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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



SEP 14 2011

OFFICE OF  
AIR AND RADIATION

Frank Marcinowski  
Deputy Assistant Secretary for  
Regulatory Compliance  
EM-10  
U.S. Department of Energy  
Washington, DC 20585

Ed Ziemianski, Manager  
Carlsbad Field Office  
U.S. Department of Energy  
P.O. Box 3090  
Carlsbad, NM 88221

Dear Mr. Marcinowski and Mr. Ziemianski:

This letter is to notify you that on September 20, 2011, US Environmental Protection Agency (EPA) is performing an unannounced, continued compliance inspection of the transuranic (TRU) waste characterization program at the Idaho National Laboratory (INL) at Idaho Falls, ID. For the past six years the Central Characterization Project (CCP) has been characterizing contact-handled (CH) TRU waste at INL. EPA approved CCP's CH TRU waste characterization program in November 2005.

This inspection, conducted under our authority in 40 CFR 194.21 and 24(h), is occurring concurrently with a similar inspection being conducted by EPA at CCP's Carlsbad Office in Carlsbad, NM. The purpose of these concurrent inspections is to evaluate CCP's characterization of waste from Nuclear Radiation Development (NRD). For the past few years, INL-CCP has been characterizing CH TRU waste from small generator sites (such as Lawrence Berkeley Laboratory, NRD, and Lawrence Livermore Laboratory). To date, EPA has not evaluated in full INL-CCP's characterization of TRU waste from these sites. This inspection of NRD waste is a snap shot of TRU waste characterization activities INL-CCP has undertaken when characterizing TRU waste from small generator sites. NRD is a small generator site located near Grand Island, NY, that produced waste from manufacturing and/or recycling of smoke detector foils.

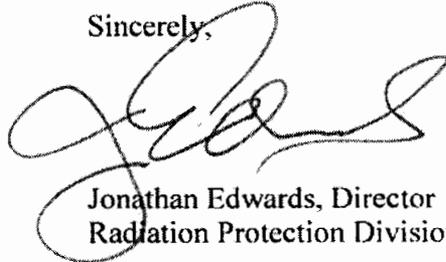
During this inspection, EPA will evaluate the quantification of the radiological contents of NRD waste containers, including the measurement systems used and supporting documentation. Mr. Ed Felcorn and EPA support contractor is conducting the inspection. Please provide them your full cooperation, including unfettered access to all areas as they request.



The enclosed scope identifies the components of the TRU waste characterization system of controls that will be evaluated during the inspection and the inspection schedule. The inspection team may inspect additional items if they deem it necessary.

Please contact Ms. Rajani Joglekar, NRD CH Unannounced Inspection Team Lead, at 202-465-5529, if you have any questions.

Sincerely,



Jonathan Edwards, Director  
Radiation Protection Division

Enclosure

cc: Electronic Distribution  
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Site Documents, CBFO  
Donna Sellmer, CTAC

**Scope of EPA's Unannounced Continued Compliance Evaluation of  
Central Characterization Project's Contact-Handled Waste Characterization Activities at  
Idaho National Laboratory, Idaho Falls, ID**

**DOE Site:** Idaho National laboratory-Central Characterization Project (INL-CCP)

**Organizations Notified:** Department of Energy – Carlsbad Field Office  
Department of Energy – Idaho Office  
EPA Regions 2, 6, and 10  
New Mexico Environment Department  
New York Department of Health  
Idaho Department of Environmental Quality

**Inspection Dates:** September 20, 2011

**Inspection Schedule:**

Tuesday 8:00 am	Contact DOE ID and INL-CCP
Tuesday 9:00 am – 4:00 pm	Conduct Inspection
Tuesday 4:30 pm	Close-Out Meeting*

\* With DOE ID, CBFO National TRU Program, INL-CCP Management and technical leads

**EPA Inspection Team:** Mr. Ed Felcorn, EPA  
Mr. Patrick Kelly, EPA Support Contractor (SC&A)

**Inspection Scope:**

EPA is conducting an unannounced inspection to evaluate the continued compliance of the technical processes implemented by INL-CCP to quantify radiological contents of NRD waste containers. EPA will evaluate nondestructive assay (NDA) system(s) and supporting documentation for characterizing contact-handled transuranic (CH TRU) waste produced by the Nuclear Radiation Development (NRD) site near Grand Island, NY, from manufacturing and/or recycling of smoke detector foils.

**EPA Replicate Assay:**

EPA will select up to three (3) NRD waste containers for replicate analysis. INL-CCP will assay the selected drums using the EPA replicate assay protocol and will provide the assay results to EPA electronically no later than October 11, 2011.

**Inspection Logistics:**

- A pre-evaluation conference/Kick-Off Meetings will be held on Tuesday, September 20, 2011 around 8:30 am

- A post-evaluation EPA briefing/Close-Out\* Meeting will be on Tuesday, September 20, 2011, at 4:30 pm

\*If EPA evaluation cannot be completed during the allotted time, the lead inspector will inform CBFO/CCP of the elements that could not be completed and any documentation needed by EPA to complete its inspection offsite.